

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

TAMARA REAVIS,

Plaintiff,

v.

**SAINT LOUIS COUNTY,
MISSOURI, et al.**

Defendants.

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Case No.: 4:19-CV-02916

**APPLICATION FOR JUDGMENT APPROVING CONFIDENTIAL WRONGFUL
DEATH SETTLEMENT AGAINST DEFENDANT SAINT LOUIS COUNTY**

COMES NOW plaintiff Tamara Reavis, pursuant to § 537.095 R.S.Mo. and for her Application for Partial Judgment Approving Confidential Wrongful Death Settlement against Defendant Saint Louis County, states as follows:

1. Plaintiff filed her Complaint in the above-captioned cause on October 25, 2019. In her Complaint, Plaintiff alleged Counts of Violation of Civil Rights Pursuant to Title 42 U.S.C. § 1983, Violation of Civil Rights Pursuant to Title 42 U.S.C. § 1983 (Failure to Implement Appropriate Policies, Customs, and Practices and Failure to Train, Supervise and Retain), Negligence Per Se in Violation of R.S.Mo. § 221.120 (Medicine and medical attention for prisoners) and Wrongful Death against defendants Saint Louis County, Missouri, Julia Childrey (nka Murphy), Melinda Ferguson, RN, Michael King, RN, Christi R. Gonzalez, RN, C.O. Mark Barbeau and Katie Cora, RN.

2. Plaintiff and defendants Melinda Ferguson, Michael King, Christi Gonzalez and Katie Cora previously reached an agreement to settle the claims made against them that has been approved by this Court by the Partial Judgment Approving Wrongful Death Settlement [Doc. 69].

3. Plaintiff and Saint Louis County have reached an agreement to settle the claims made against it, that includes the dismissal of Julia Murphy and Mark Barbeau, subject to approval by this Court. The provisions of the settlement are set forth in the Release of Claims and Settlement Agreement provided to the Court in Exhibit B. Pursuant to § 537.080 R.S.Mo., Plaintiff, her children and decedent's parents are the only members of the class of persons entitled to bring this action for the wrongful death of Mr. Larry Reavis.

4. Plaintiff has contemporaneously with this Application filed a Motion to Dismiss with Prejudice Julia Murphy and Mark Barbeau consistent with the terms of the settlement between the parties.

5. Plaintiffs seek approval of this settlement by the Court under the provisions of § 537.095 R.S.Mo. In support thereof, Plaintiff, her children and decedent's surviving parents submit their affidavits requesting approval of the settlement and distribution of the settlement funds. See Exhibit A – Affidavits - filed under seal at request of the parties.

6. Plaintiff requests that the Court enter an order approving Plaintiff's execution of the Release of Claims and Settlement Agreement, payment of attorneys' fees as contracted, and collection and distribution of the net proceeds as ordered by the Court. Plaintiff will acknowledge satisfaction in the full amount paid by Defendant St. Louis County and file a Motion for Dismissal with Prejudice with the Court.

WHEREFORE, Plaintiff respectfully requests the Court enter its Judgment Approving the Confidential Settlement with Defendant Saint Louis County, and for such further relief that this Court deems reasonable and just.

Respectfully submitted this 17th day of February, 2021.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification to counsel of record.

/s/ Lauren Perkins Allen